

FILED
U.S. DISTRICT COURT

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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN ANTHONY BORELL III,

Defendant.

SEALED
INDICTMENT

VIO. 18 U.S.C. §1030(a)(5)(A),
COMPUTER INTRUSION

Case: 2:12-cr-00163
Assigned To : Nuffer (DJ), David
Assign. Date : 04/04/2012
Description: USA v.

The Grand Jury Charges:

COUNT 1
(18 U.S.C. §1030(a)(5)(A), Computer Intrusion)

On or about January 19, 2012, in the Central Division of the District of Utah
and elsewhere,

JOHN ANTHONY BORELL III,

the defendant herein, knowingly caused the transmission of a program, information, code and command, and as a result of such conduct, intentionally caused damage without authorization, to a protected computer as defined by 18 U.S.C. §1030(e)(2)(B), to wit: he did conduct an SQL injection attack (a form of “hacking”) on the server(s) hosting the website <http://www.utahchiefs.org>, a computer used in and affecting interstate commerce and communication; and the offense caused loss to one or more persons during a one-year period aggregating at least \$5,000; all in violation of 18 U.S.C. §1030(a)(5)(A) and punishable under 18 U.S.C. §1030(c)(4)(B)(i).

COUNT 2
(18 U.S.C. §1030(a)(5)(A), Computer Intrusion)

On or about January 31, 2012, in the Central Division of the District of Utah and elsewhere,

JOHN ANTHONY BORELL III,

the defendant herein, knowingly caused the transmission of a program, information, code and command, and as a result of such conduct, intentionally caused damage without authorization, to a protected computer as defined by

18 U.S.C. §1030(e)(2)(B), to wit: he did conduct an SQL injection attack (a form of "hacking") on the server(s) hosting the website <http://slcpd.com>, a computer used in and affecting interstate commerce and communication; and the offense caused loss to one or more persons during a one-year period aggregating at least \$5,000; all in violation of 18 U.S.C. §1030(a)(5)(A) and punishable under 18 U.S.C. §1030(c)(4)(B)(i).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

DAVID B. BARLOW
United States Attorney



ADAM S. ELGGREN
Assistant United States Attorney